14. (Amended) The method of claim 6, further including the step of:

routing said packet data having said globally defined address to said second host via a wireless network.

23. (Amended) The method of claim 19, wherein:

said step of routing comprises the step of transmitting said packet data having said translated global address therein from a mobile station; and

said step of storing comprises the step of storing said one or more global ~~addresses in said router~~ means.

REMARKS

Reconsideration and allowance are respectfully requested in view of the foregoing amendments and the following remarks.

Claims 1 -6 and 11-24 are pending in this application.

Regarding the Specification

The Examiner requested a new specification incorporating the changes proposed by the Applicant in the preliminary amendment. As such, Applicant is providing a substitute specification which is substantially identical to the original specification but for the changes prescribed in the preliminary amendment are incorporated therein. Applicant requests that the substitute specification be substituted for the originally filed specification. Applicant submits that no new matter has been added to the specification.

Regarding the Claim Objections

Claims 1 and 23 were objected to because of a few informalities. Applicant appreciates the Examiner's comments and has amended the claims accordingly. In particular, claim 1 has been amended to indicate that the mobile station is adapted to wirelessly communicate to an external network.

With respect to claim 23, this claim has been amended by removing the words "mobile station" and replacing them with "router means" such that the step of storing comprises a step of storing said one or more global addresses in said router means.

Applicant respectfully submits, based on the above, that all the claim objections have been addressed and request that the claim objects be withdrawn.

Regarding the § 103 Rejection

Claims 1-6 and 11-24 were rejected under 35 U.S.C. § 103(a) as being rendered obvious by "Configuring Network Address Translation" by Cisco in view of U.S. Patent No. 6,088,337 to Eastman et al.

Applicant would agree with the Examiner that the figure 130 of Configuring Network Address Translation (hereinafter referred to as "Cisco") depicts two separate networks separated by a router. One of the networks is referred to as an inside network and the other network is referred to as an outside network. The figure further shows at least one host (e.g., host with address 1.1.1.1) sending a packet to a host located on an outside network. The packet first traverses a router where a network address translation is performed. Also shown is the packet being sent to the host "B" on the external network where the translated packet has been modified

with one of the globally defined addresses (the source address is changed from 1.1.1.1 to 2.2.2.2).

Eastman et al at column 10, lines 38-67 (as indicated by the Examiner) specifically requires that the base station will be required to map the IP address destined for pier device to the physical address of that device. Col. 10, lines 57-59. This means that in Eastman et al the mapping is performed outside of the LAN in the base station rather than at the router. The combination of those Cisco and Eastman et al would require that in a wireless network, the network address translation (NET) would be performed at the base station rather than at the local LAN.

Applicant respectfully points out that § 706.02(j) of the MPEP holds that there are three necessary elements to establish a prima facie case of obviousness as adopted in *In re Vaeck*. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. *In re Vaeck*, 947 F2nd 488. Second, there must be a reasonable expectation of success. Finally, the prior art reference (or references when combined) must teach or suggest all the claim limitations. The teaching or suggestion to make the claimed combination and their reasonable expectation of success must both be found in the prior art and not based on Applicant's disclosure. Id.

Applicant respectfully points out that the Cisco reference teaches hard wiring the router directly to the Internet. Cisco makes no suggestion that the inside system could be connected to the outside system via a wireless network which would include base stations and mobile stations and MSCs as well as PMSCs. By the same token, Eastman et al requires that the NAT be performed at a base station so that the IP administration process will be completely transparent to

the users and provide compatability with existing Internet service providers. As such the users of the LAN would not be concerned with the translation but instead the owner of the base station would be concerned with it. This in fact teaches away from anything claimed. Applicant respectfully points out that a *prima facie* case of obviousness has not been presented and requests that the § 103 rejection be withdrawn.

Applicant respectfully submits that hindsight cannot be used in an obviousness rejection. The Examiner indicated that even if "there is a relationship shown in Figure 2 of Applicant's disclosure, Examiner notes that it would have been obvious to pass traffic using a mobile phone over a wireless link while still performing a network translation. The Examiner notes that this would have been obvious because the wireless link occurs at layer one (and possibly two), while a network address translation performed at layer 3 using the OSI model." Applicant points out that there has been no support for this in the art cited by the Examiner. That the Examiner believes that it is obvious then there must be support in the cited references as required in *In re Vaeck*.

As such, Applicant respectfully requests that the § 103 rejection be withdrawn.

A few of the claims have been amended in order to better clarify the claimed invention such that it is understood that the translations take place on the mobile LAN side of the wireless communication.

Applicant having indicated that a *prima facie* case of obviousness has not been established and after better clarifying a few of the claims, respectfully requests that the § 103 rejection be withdrawn and submits that all claims are now ready for allowance.

Should the Examiner have any further questions or comments facilitating allowance, the Examiner is invited to contact Applicant's representative indicated below to further prosecution of this application to allowance and issuance.

In view of the above, it is believed that this application is in condition for allowance, and such a Notice is respectfully requested.

Respectfully submitted,
JENKENS & GILCHRIST,
A Professional Corporation

Date: JAN 13, 2003

Steven R. Greenfield
Registration No. 38,166

1445 Ross Avenue, Suite 3200
Dallas, Texas 75202-2799
(Direct) 214/855-4789
(Fax) 214/855-4300

EXHIBIT "A" - CLAIMS MARKED TO SHOW CHANGES

1. (Twice Amended) A mobile LAN [(201)] for a first number of hosts [(2021, 2022, 2023, 2024)], comprising:

a router [(204)] connected to said first number of hosts;

a mobile station [(205)] connected to said router [(204)] said mobile station adapted to wirelessly communicate to an external network;

at least one host [(2024)] in the first number of hosts being capable of generating packet data suitable for transmission within said mobile LAN;

memory [(206)] connected to said router [(204)] for storing one or more globally defined addresses of the kind utilized in communicating data from any of said first number of hosts to at least one host connected in [an] said external network; and

an address translator [(207)] connected to said memory and said router [(204)] for translating said packet data generated by said at least one host in the first number of hosts into packet data suitable for transport to said at least one host in said external network, said translated packet data including one of said globally defined addresses stored in said memory.

2. (Twice Amended) A mobile LAN as claimed in claim 1, wherein:

said address translator, after receiving data received via said mobile station, changes a destination address field of data packets originated externally to said LAN and intended for a first of said first number of hosts from a globally defined address into a locally defined address that identifies said first of said first number of hosts.

4. (Amended) A mobile LAN as claimed in claim 1, wherein:

said router [(204)], said memory [(206)] and said address translator [(207)] are disposed in said mobile station [(205)].

6. (Twice Amended) A method of communicating packet data between a first host among a first number of interconnected hosts and a second host in an external network utilizing globally defined addresses, said packet data being routed and radio transmitted to said external network, said method comprising the steps of:

(a) utilizing a locally defined address in said packet data to be communicated by said first host;

(b) storing, in a router associated with said first number of interconnected hosts, one or more globally defined addresses of the kind utilized in communicating said packet data between said interconnected hosts and said second host in the external network, and

(c) translating the locally defined address in said packet data communicated by the first host into one of the said globally defined addresses stored in step b).

11. (Amended) The mobile LAN of claim 1, wherein:

a plurality of said globally defined addresses are stored in [said] a memory closely associated with said router, said address translator translating said packet data generated by said at least one host in the first number of hosts, prior to a wireless communication with said external network, to include a first globally defined address stored in said memory so long as successive communications between said at least one host in the first number of hosts and said at least one host in the external network occur within a predetermined period of time from each other.

13. (Amended) The mobile LAN of claim 1, wherein:

said router directs said translated packet data towards [said] a wireless interface between said mobile LAN and said external network, and then to at least one host in the external network.

14. (Amended) The method of claim 6, further including the step of:

routing said packet data having said globally defined address to said second host via a wireless network.

23. (Amended) The method of claim 19, wherein:

said step of routing comprises the step of transmitting said packet data having said translated global address therein from a mobile station; and

said step of storing comprises the step of storing said one or more global addresses in said [mobile station] router means.